

State of New Jersey

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Lt. Governor

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March 10, 2022

VIA ELEC. FILING

Honorable Ann Marie Donio, U.S.M.J. Mitchell H. Cohen U.S. Courthouse 1 John F. Gerry Plaza Camden, New Jersey 08101

Re: Maurice Gordon, Sr., et al, v. Randall Wetzel, et al.

Docket No.: 21-cv-4861 (KMW-AMD)

Dear Judge Donio:

The undersigned represents Defendants Gurbir S. Grewal and Patrick J. Callahan in the above-captioned matter. I write to respectfully request that the return date for Defendants' motion to dismiss be advanced one cycle to April 4, 2022, to permit additional time for Defendants to file a reply.

Defendants' motion was filed on January 20, 2022, and currently has a return date of March 21, 2022. [ECF No. 87]. In response, Plaintiffs recently filed their opposition on March 7, 2022, (ECF No. 97), which made Defendants' reply due March 14, 2022. However, due to the press of other work matters and on-going discovery in this case, Defendants request additional time to file their reply brief.

On this date, we contacted counsels for the co-defendant, Randall Wetzel and Plaintiff via email to obtain their responses to this request. Although they have not responded as of this time, it should be noted that our email was sent earlier this afternoon, which may not have provided sufficient time to respond.



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Should the Court grant this request, State Defendants will file their reply on or before April 4, 2022. I thank the Court for its consideration of this matter.

Respectfully submitted,

CHRISTOPHER A. EDWARDS
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: Eric Intriago

Eric Intriago Deputy Attorney General

cc: All counsel of record (via CM/ECF)